| 1  | LYSSA S. ANDERSON                                                                                       |                             |                       |  |
|----|---------------------------------------------------------------------------------------------------------|-----------------------------|-----------------------|--|
|    | Nevada Bar No. 5781                                                                                     |                             |                       |  |
| 2  | RYAN W. DANIELS                                                                                         |                             |                       |  |
|    | Nevada Bar No. 13094                                                                                    |                             |                       |  |
| 3  | KAEMPFER CROWELL<br>1980 Festival Plaza Drive, Suite 650                                                |                             |                       |  |
| 4  | Las Vegas, Nevada 89135                                                                                 |                             |                       |  |
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|    | landerson@kcnvlaw.com                                                                                   |                             |                       |  |
| 6  | rdaniels@kcnvlaw.com                                                                                    |                             |                       |  |
| 7  | Attorneys for Defendant                                                                                 |                             |                       |  |
| ′  | Autorneys for Defendant<br>  City of North Las Vegas                                                    |                             |                       |  |
| 8  |                                                                                                         |                             |                       |  |
|    |                                                                                                         |                             |                       |  |
| 9  | UNITED STATES DISTRICT COURT                                                                            |                             |                       |  |
| 10 | DISTRICT OF NEVADA                                                                                      |                             |                       |  |
|    |                                                                                                         |                             |                       |  |
| 11 | GARRY E. GOLDING,                                                                                       | Case No.:                   | 2:17-cv-02340-RFB-PAL |  |
| 10 | District CC                                                                                             |                             |                       |  |
| 12 | Plaintiff, vs.                                                                                          | STIE                        | PULATION TO EXTEND    |  |
| 13 | VS.                                                                                                     | DISPOSITIVE MOTION DEADLINE |                       |  |
|    | CITY OF NORTH LAS VEGAS, a municipal                                                                    | 2131 331                    |                       |  |
| 14 | corporation,                                                                                            |                             | (Third Request)       |  |
|    |                                                                                                         |                             |                       |  |
| 15 | Defendants.                                                                                             |                             |                       |  |
| 16 |                                                                                                         |                             |                       |  |
| 10 |                                                                                                         |                             |                       |  |
| 17 | Garry E. Golding and the City of North Las Vegas, by and through their counsel of                       |                             |                       |  |
|    |                                                                                                         |                             |                       |  |
| 18 | record, agree and stipulate to extend the dispositive motion deadline (currently set for February       |                             |                       |  |
| 19 | 4, 2019) an additional 15 days so that the new dispositive motion deadline will be <b>February 19</b> , |                             |                       |  |
|    |                                                                                                         |                             |                       |  |

record, agree and stipulate to extend the dispositive motion deadline (currently set for February 4, 2019) an additional 15 days so that the new dispositive motion deadline will be **February 19, 2019**. This is the third requested extension between the parties for this deadline. The parties request this extension because as set out in the parties' prior requests, one of the Defendant's key witnesses was unavailable for his deposition due a severe illness. That witness has now been deposed and the parties are waiting on the deposition transcript that will be necessary to prepare

dispositive motions. In addition, CNLV's Counsel has nearly twenty (20) depositions scheduled

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|    | : I                                                                                                 |                                                |  |  |
|----|-----------------------------------------------------------------------------------------------------|------------------------------------------------|--|--|
| 1  | for the month of January as well as hearings and substantial deadlines in other matters which       |                                                |  |  |
| 2  | preclude Counsel's ability to prepare an adequate dispositive motion.                               |                                                |  |  |
| 3  | The extension will not prejudice any party and will allow the parties to obtain the                 |                                                |  |  |
| 4  | deposition transcript and enough time to properly brief their dispositive motions for this Court.   |                                                |  |  |
| 5  | The parties are not delaying the conclusion of this matter by delaying trial or otherwise; no trial |                                                |  |  |
| 6  | date has yet been ordered.                                                                          |                                                |  |  |
| 7  | IT IS SO STIPULATED this 15 <sup>th</sup> day of January, 2019.                                     |                                                |  |  |
| 8  | KAEMPFER CROWELL                                                                                    | LAW OFFICE OF MICHAEL BALABAN                  |  |  |
| 9  | Den /c/Lease As James                                                                               | Den /a/Miakaad Dalakaa                         |  |  |
| 10 | By: /s/ Lyssa Anderson<br>LYSSA S. ANDERSON                                                         | By: /s/ Michael Balaban MICHAEL BALABAN, ESQ.  |  |  |
| 11 | Nevada Bar No. 5781<br>1980 Festival Plaza Dr., Ste. 650                                            | Nevada Bar No. 9370<br>10726 Del Rudini Street |  |  |
| 11 | Las Vegas, Nevada 89135                                                                             | Las Vegas, NV 89141                            |  |  |
| 12 | Attorneys for Defendant<br>City of North Las Vegas                                                  | Attorneys for Plaintiff                        |  |  |
| 13 |                                                                                                     | Garry E. Golding                               |  |  |
| 14 | ORDER                                                                                               |                                                |  |  |
| 15 |                                                                                                     | ORDER                                          |  |  |
| 16 | IT IS SO ORDERED.                                                                                   | R                                              |  |  |
| 17 |                                                                                                     | RICHARD F. BOULWARE, II                        |  |  |
| 18 |                                                                                                     | UNITED STATES DISTRICT JUDGE                   |  |  |
| 19 |                                                                                                     | DATED this 16th day of January, 2019.          |  |  |
| 20 |                                                                                                     |                                                |  |  |
| 21 |                                                                                                     |                                                |  |  |
| 22 |                                                                                                     |                                                |  |  |
|    |                                                                                                     |                                                |  |  |
| 23 |                                                                                                     |                                                |  |  |
| 24 | .]                                                                                                  |                                                |  |  |

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